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September 17, 2018

The Honorable Barbara Moses
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Seidman v. Gax Productions LLC – Docket No.1:18-cv-2048

Dear Judge Moses:

This letter is written in response to the Plaintiff's letter filed today.

Plaintiff sent her Third Amended Responses to Defendant at 11:35 pm, Sunday September 16, 2018 (Exhibit 1). The responses to Requests 1 and 2 continue to state: "Plaintiff has produced non-privileged documents responsive to this request", failing to identify if any privileged documents exist.

Counsel for both parties spoke ("meeting and conferring") on Thursday, September 13th. On Friday, September 14th, Defendant sent Plaintiff an email rejecting Plaintiff's most recent settlement offer, making a counter offer. This morning, before seeing Plaintiff's letter to the Court, at Plaintiff's request, Defendant's Counsel agreed to speak with Plaintiff's Counsel this afternoon.

Unfortunately, Defendant has been required to file a Motion to Compel and to write numerous letters to the Plaintiff and to the Court to satisfy what are nine, simple discovery requests.

Thank you for your consideration of this matter.

Sincerely,

Laurence Singer

Laurence Singer

cc: Richard Liebowitz, Esq.